

**THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NEW JERSEY CARPENTERS VACATION  
FUND and BOILERMAKER BLACKSMITH  
NATIONAL PENSION TRUST, *on Behalf of  
Themselves and All Others Similarly Situated,*

Plaintiffs,

v.

THE ROYAL BANK OF SCOTLAND GROUP,  
PLC, GREENWICH CAPITAL HOLDINGS,  
INC., GREENWICH CAPITAL ACCEPTANCE,  
INC., GREENWICH CAPITAL FINANCIAL  
PRODUCTS, INC., ROBERT J. MCGINNIS,  
CAROL P. MATHIS, JOSEPH N. WALSH, III,  
JOHN C. ANDERSON, JAMES M. ESPOSITO,  
RBS SECURITIES, INC. f/k/a GREENWICH  
CAPITAL MARKETS, INC., d/b/a RBS  
GREENWICH CAPITAL, MOODY'S  
INVESTORS SERVICE, INC. and THE  
MCGRAW-HILL COMPANIES, INC.,

Defendants.

**Case No.: 08-CV-5093 (HB)**

**ECF CASE**

**JOINT MOTION TO INTERVENE BY LEAD PLAINTIFFS, LABORERS' PENSION  
FUND AND HEALTH AND WELFARE DEPARTMENT OF THE CONSTRUCTION  
AND GENERAL LABORERS' DISTRICT COUNSEL OF CHICAGO AND VICINITY  
AND MIDWEST OPERATING ENGINEERS PENSION TRUST FUND**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Declaration of Kenneth M. Rehns, dated July 12, 2010, proposed intervenors Laborers' Pension Fund and Health and Welfare Department of the Construction and General Laborers' District Counsel of Chicago and Vicinity ("Chicago Laborers") and Midwest Operating Engineers Pension Trust Fund ("Midwest OE") (collectively, the "Movants") and Lead Plaintiffs New Jersey Carpenters Vacation Fund ("Carpenters Fund") and Boilermaker Blacksmith National Pension Trust ("Boilermaker") (collectively, "Lead Plaintiffs") respectfully jointly move this Court for an order allowing Chicago Laborers and Midwest OE to intervene by right, or in the

alternative, by permission as a representative plaintiff in the above-captioned action pursuant to Fed. R. Civ. P. 24.

Dated: July 12, 2010  
New York, New York

By: /s/ Christopher Lometti

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*Lead Counsel for the Class and Attorneys for the  
Movants*

**CERTIFICATE OF SERVICE**

I, Kenneth M. Rehns, counsel for Lead Plaintiffs and Movants, hereby certify that on July 12, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses of all counsel of record in this action.

/s/ Kenneth M Rehns  
Kenneth M. Rehns